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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CAROLINE BARKER,

Plaintiff,

v.

LAUREN MCFERRAN, Chairman, National
Labor Relations Board,

Defendant.

) CASE NO. 4:23-cv-308-DMR

) **STIPULATION TO EXTENSION OF TIME FOR**
) **DEFENDANT'S RESPONSE TO PLAINTIFF'S**
) **SECOND AMENDED COMPLAINT**

) The Honorable Donna M. Ryu

Pursuant to Civil Local Rule 6-2, the parties to this action hereby stipulate to an extension of time for Defendant to file his response to Plaintiff's second amended complaint. Defendant will file his response to Plaintiff's amended complaint by July 8, 2024. For these reasons, and as articulated below in the Declaration of Counsel, the parties respectfully request that the Court grant their stipulation.

DATED: June 12, 2024

Respectfully submitted,¹

ISMAIL J. RAMSEY
United States Attorney

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney

Attorneys for Defendant

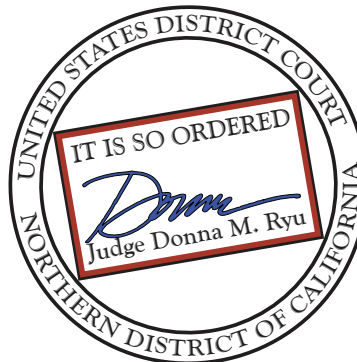
DATED: June 12, 2024

s/ Caroline Barker
CAROLINE BARKER
Plaintiff, *pro se*

ORDER

Pursuant to stipulation, IT IS SO ORDERED. Defendant will file a response to Plaintiff's second amended complaint by July 8, 2024.

DATED: June 17, 2024



HON. DONNA M. RYU
United States Chief Magistrate Judge

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On June 4, 2024, Defendant received the ECF notification of Plaintiff's amended complaint. *See* Dkt. No. 68.

3. On June 5, 2024, I contacted Plaintiff regarding Defendant's request for a brief extension of time to prepare their response to the amended complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 12, 2024

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney